

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Joel Vangheluwe and Jerome
Vangheluwe,

Plaintiffs,

v.

GotNews, LLC, Freedom Daily,
LLC, Charles C. Johnson, Alberto
Waisman, Jeffrey Rainforth, Jim
Hoft, David Petersen, Jonathan Spiel,
Shirley Husar, Eduardo Doitteau,
Lita Coulthart-Villanueva, Kenneth
Strawn, Patrick Lehnhoff, Beth
Eyestone, Lori Twohy, Raechel
Hitchye, James Christopher Hastey,
Christopher Jones, Connie Comeaux,
Gavin McInnes, Richard Weikart,
and Paul Nehlen,

Defendants.

Case No. :

DEMAND FOR JURY TRIAL

COMPLAINT

Plaintiffs, JOEL VANGHELUWE and JEROME VANGHELUWE

(collectively referred to as “Plaintiffs” herein) hereby allege as follows:

INTRODUCTION

1. This case is about a father and son who were falsely accused of assault, terrorism, conspiracies, murder, and racially charged violence.
2. On August 12, 2017, the Vangheluwe family was hosting a wedding at their home for a family member. During that wedding the Vangheluwes’ social media, emails, and text messages became overwhelmed with messages and posts.

3. Earlier that day, a terror attack occurred in Charlottesville, Virginia, when an individual drove his car through counter-protestors at a “Unite the Right” rally. One person was murdered, Heather Heyer, and others seriously injured. Defendants used the Vangheluwes as political pawns, shifting the blame from alt-right extremists to an innocent 20-year-old boy who never owned or drove the car in question.

4. GotNews, LLC, a self-proclaimed Alt-Right news outlet, published an article falsely naming twenty-year-old Michigan resident Joel Vangheluwe as the driver of the vehicle and the perpetrator of the terror attack. At the time of the attack, Joel Vangheluwe was attending his cousin’s wedding in another state. GotNews posted the names, photographs and personal information of Joel and his father Jerome Vangheluwe, incorporating various pieces of personal information about them.

5. The other Defendants falsely claimed that Jerome Vangheluwe owned the vehicle at the time it ran down protestors in Charlottesville. They then linked Joel Vangheluwe’s Facebook with a caption stating that Joel would receive the car when he was sixteen (which is not true). Defendants falsely accused Joel Vangheluwe of being the perpetrator of the attack.

6. Jerome Vangheluwe legally sold the vehicle in question years earlier. The vehicle was sold several more times before it came into the possession of the man accused of the crime.

7. Defendants attempted to convince readers that Joel had a political agenda when the terrorist attack on American soil occurred. Nothing could be further from the truth. The torrent of accusations against the Vangheluwes accomplished the over-arching goal of the alt-right media to distract their readers into believing the attack was made by someone other than a member of the alt-right movement. This was ultimately untrue, as just hours after the terror attack the actual suspect was apprehended by police and charged with second-degree murder, malicious wounding and failure to stop in an accident that resulted in death. He has been linked with alt-right groups.

8. The flood of misinformation resulted in injury to both Joel and Jerome Vangheluwe. They received death threats and were urged by Michigan State Police to leave their home for fear of their safety. The injury to their reputations and business aspirations is astronomical. With no regard to the consequences, the Defendants branded Joel Vangheluwe a terrorist.

THE PARTIES

9. Plaintiff Joel Vangheluwe is a resident of Bruce Township, Michigan.

10. Plaintiff Jerome Vangheluwe is a resident of Bruce Township,

Michigan.

11. Defendant GotNews, LLC, is a California limited liability corporation with a place of business in Sacramento, California. It may be served by serving its registered agent, Charles C. Johnson, at his address, [REDACTED]
[REDACTED], California, [REDACTED] or wherever he may be found.

12. Defendant Freedom Daily, LLC, is a Nevada limited liability corporation. It may be served by serving its principle place of business, [REDACTED]
[REDACTED] Las Vegas, Nevada, 89147-7947.

13. Defendant Charles C. Johnson is an individual residing in California. He is the creator and editor of GotNews, LLC. He may be served by serving him at his residential address, [REDACTED] California,
[REDACTED] or wherever he may be found.

14. Defendant Alberto Waisman, is an individual residing in California. He is a featured writer for freedomdaily.com. He may be served by serving him at his residential address, [REDACTED] California, [REDACTED] or wherever he may be found.

15. Defendant Jeffrey Rainforth is an individual residing in California. He is listed as a contributor to articles for freedomdaily.com. He may be served by serving him at his residential address, [REDACTED] California,
[REDACTED] or wherever he may be found.

16. Defendant Jim Hoft is an individual residing in Missouri. He is the creator and editor of the conservative political blog “The Gateway Pundit.” He may be served by serving him at his residential address, [REDACTED], Missouri, [REDACTED], or wherever he may be found.

17. Defendant David Petersen is an individual residing in California. He operates the news website, Twitter handle and Facebook page entitled “Puppet String News.” He may be served by serving him at his address, [REDACTED] [REDACTED] California, [REDACTED], or wherever he may be found.

18. Defendant Jonathan Spiel (known online as “Jon Masters”) is an individual residing in Oregon. Defendant Spiel operates the YouTube channel and website “Studio News Network.” He may be served by serving him at his residential address, [REDACTED], Oregon, [REDACTED], or wherever he may be found.

19. Defendant Shirley Husar is an individual residing in California. She is the co-founder/CEO of Story.com and a columnist for the *Washington Times*. She may be served by serving her at her residential address, [REDACTED] [REDACTED], California, [REDACTED], or wherever she may be found.

20. Defendant Eduardo Doitteau is an individual residing in California. He operates the Twitter handle @ed_doitteau. He may be served by serving him at his residential address, [REDACTED], California, [REDACTED]

[REDACTED] or wherever he may be found.

21. Defendant Lita Coulthart-Villanueva is an individual residing in California. She operates the Twitter handle @clitav. She may be served by serving her at her residential address, [REDACTED], California, [REDACTED] or wherever she may be found.

22. Defendant Kenneth Strawn is an individual residing in California. He operates the Twitter handle @strawn_04. He may be served by serving him at his residential address, [REDACTED], California, [REDACTED] or wherever he may be found.

23. Defendant Patrick Lehnhoff is an individual residing in Missouri. He may be served by serving him at his residential address, [REDACTED], Missouri, [REDACTED] or wherever he may be found.

24. Defendant Beth Eyestone is an individual residing in Arkansas. She may be served by serving her at her residential address, [REDACTED], [REDACTED], Arkansas, [REDACTED] or wherever she may be found.

25. Defendant Lori Twohy is an individual residing in North Carolina. She may be served by serving her at her residential address, [REDACTED], North Carolina, [REDACTED] or wherever she may be found.

26. Defendant Raechel Hitchye is an individual residing in Arizona. She may be served by serving her at her residential address, [REDACTED]

Arizona, [REDACTED] or wherever she may be found.

27. Defendant James Christopher Hastey is an individual residing in Texas. He operates the Twitter handle @ChrisHastey. He may be served by serving him at his residential address, [REDACTED], Texas, [REDACTED] or wherever he may be found.

28. Defendant Christopher Jones is an individual residing in West Virginia. He may be served by serving him at his residential address, [REDACTED]
[REDACTED] West Virginia, [REDACTED] or wherever he may be found.

29. Defendant Connie Comeaux is an individual residing in Arkansas. She operates the Twitter handle @ConnieComeaux. She may be served by serving her at her residential address, [REDACTED], Arkansas, [REDACTED] or wherever she may be found.

30. Defendant Gavin McInnes is an individual residing in New York. He operates the Twitter handle @Gavin_McInnes. He may be served by serving him at his residential address, [REDACTED], New York, [REDACTED] or wherever he may be found.

31. Defendant Richard Weikart is an individual residing in Indiana. He operates the Twitter handle @RichWeikart. He may be served by serving him at his residential address, [REDACTED], Indiana, [REDACTED]
[REDACTED] or wherever he may be found.

32. Defendant Paul Nehlen is an individual residing in Wisconsin. He operates the Twitter handle @pnehlen. He may be served by serving him at his residential address, [REDACTED], Wisconsin, [REDACTED], or wherever he may be found.

JURISDICTION AND VENUE

33. Jurisdiction exists in this Honorable Court pursuant to 28 U.S.C. § 1332 and the Constitution and Laws of the United States; defendants specifically and purposefully targeted residents of the State of Michigan, with full knowledge and intent that the effects of their actions would be felt in the State of Michigan, and thereby purposefully availed themselves of the jurisdiction of this Honorable Court. *See, e.g., Calder v. Jones*, 465 U.S. 783 (1984). Plaintiffs aver that their damages exceed the jurisdictional threshold of \$75,000 under 28 U.S.C. § 1332.

34. The Michigan long-arm statute governing limited personal jurisdiction over individuals, Mich. Comp. Laws §600.705, has been interpreted as conferring upon Michigan courts the “maximum scope of personal jurisdiction permitted by the Due Process Clause of the Fourteenth Amendment.” *MLS Nat. Med. Evaluation Services, Inc. v. Templin*, 812 F. Supp. 2d 788, 795 (E.D. Mich. 2011).

35. Venue is proper in this Honorable Court pursuant to the provisions of 28 U.S.C. §1391(a)(2), because a substantial part of the events and omissions giving rise to the claim occurred in the Eastern District of Michigan.

FACTS

36. On August 12, 2017, a Dodge Challenger was driven into a crowd of counter-protestors at a “Unite the Right” rally in Charlottesville, Virginia. The terror attack resulted in the death of Heather Heyer, a 32-year-old Charlottesville legal assistant. Nineteen others were injured in the attack.

37. Within hours of the terror attack, James Fields Jr., an individual from Ohio, was apprehended by police and charged with second-degree murder, malicious wounding and failure to stop in an accident that resulted in death.

38. The same day, Defendant GotNews LLC (“GotNews”) falsely reported Joel Vangheluwe as the domestic terrorist who drove a Dodge Challenger into a crowd of counter-protestors at a “Unite the Right” rally in Charlottesville, Virginia.

39. The GotNews article led with a picture of Joel Vangheluwe pulled from his Instagram account, and is headlined: “BREAKING: #Charlottesville Car Terrorist Is Anti-Trump, Open Borders Druggie.”¹ The subheading stated: “Evidence indicates a left-winger mowed down antifa counter-protestors in Charlottesville, not a right-winger or white nationalist, GotNews can exclusively reveal.”

40. GotNews cited Facebook pages and a license plate search to support its accusations, stating: “License plate searches of the 2010 Dodge Challenger that

¹ Exhibit A (GotNews Article)

killed one and injured nearly 20 in Charlottesville found that the vehicle was registered to Jerome Vangheluwe of Michigan. A Facebook crawl of his relatives reveals the car was in the possession of his son, Joel.” The article incorporated a picture of the mobile version of Joel Vangheluwe’s LinkedIn account, which included such personal information as his full name, picture, current location, and where and when he attended high school.

41. The article alleged: “Joel likes taking drugs and getting stoned, a look at his social media shows. What [sic] he under the influence when he crashed into the crowd at Charlottesville?” Screenshots of Joel Vangheluwe’s Facebook and Instagram pages also accompanied the article. Defendant Charles C. Johnson is the creator and CEO of Defendant GotNews, LLC.

42. Defendant Freedom Daily, LLC, (“Freedom Daily”) published an article on its website freedomdaily.com with the headline: “BREAKING: Driver Who Plowed Into Charlottesville Crowd Identified – Media Tries To Hide Who It Is.”² The article goes on to say: “Although it was originally reported that the driver of the car was a far right sympathizer it’s now been confirmed that it was indeed a Democrat Party member and Antifa terrorist drove his car into free speech advocates in Charlottesville Virginia this morning.”

² Exhibit B (Freedom Daily Article)

43. The Freedom Daily article incorporated a picture of the mobile version of Joel Vangheluwe's LinkedIn account, which included such personal information as his full name, picture, current location, and where and when he attended high school. Screenshots of his Facebook page were also added in between the text of the article. Defendant Alberto Andres Waismann is credited with authoring the article defaming the Vangheluwes. Defendant Jeffrey Rainforth is credited as a contributor to the same article.

44. The Gateway Pundit, a political blog operated by Defendant Jim Hoft, posted an article to its website, www.thegatewaypundit.com, with the headline: "REPORT: Driver in Virginia Car Attack Was Anti-Trump Protestor – Joel Vangheluwe."³ The article went on to imbed two tweets stating Joel Vangheluwe was the driver of the Challenger in Charlottesville. Defendant Hoft was credited as the author of the article.

45. Defendant David Petersen posted a similar article on his news blog, www.puppetstringnews.com ("Puppet String News"). The headline read: "Friendly Fire...Charlottesville Car attacker is anti-Trump Antifa supporter [...]"⁴ Immediately below the headline, the article incorporated a collage of pictures from Joel Vangheluwe's social media accounts along with registration information for the

³ Exhibit C (Gateway Pundit Article)

⁴ Exhibit D (Puppet String News Articles)

Dodge Challenger indicating the vehicle belonged to Joel's father, Jerome. The pictures also included Joel's email address.

46. Defendant Petersen's article incorporated the same information as the GotNews article, along with original text, stating:

Well it looks like we now know more information about the car attack today at a Unite the Right rally in Charlottesville Virginia and it looks like friendly fire as the driver/owner of the Dodge Challenger is now a known antifa/anti Trump supporter. Guess you can say the Left tried to basically use an anti Trump/Antifa terrorist to make it look like a Trump supporter did it, but all of those claiming this as a terrorist attack from a Trump supporter... Well there is this thing called the internet.

So once again Left Wing terrorism has been exposed in America, where the driver of this Dodge Challenger that ran over nearly 19 people killing one is an anti Trumper and Antifa supporter of [sic] member. So now basically lefties in America are committing terrorist attacks in America on their own people to blame it on Trump and his supporters.

47. Following the text, Petersen posted more pictures taken from Joel Vangheluwe's social media accounts as well as the Dodge Challenger's registration information. That information included Jerome Vangheluwe's full name, age, location, the names of his relatives, and the last four digits of his phone number. The pictures also incorporated the caption: "This is Jerome Vangheluwe. He is the owner of the 2010 Dodge Challenger which crashed into 20 people at an Antifa rally in Virginia. He has lived in Michigan, Ohio, and now possibly lives in Detroit. He most likely bought this car for his son, Joel Vengheluwe [sic]."

48. Defendant Petersen posted another article the day after the first post, with the headline: “Truth! Charlottesville car ramming investigation not limited to the driver.” The text of the article read:

Well it looks like the so called driver that killed one person and injured around 20 in Charlottesville, VA may not just be the only person involved in the violent attack. Remember that James Alex Fields Jr.’s name doesn’t even come up on the registration of the vehicle, as the vehicle registration is registered in Michigan even though it has Ohio plates to Jerome Vangheluwe the father of a Antifa member and anti Trumper Joel Vangheluwe.

Now if you look at Joel’s Facebook page, you will see a photo that claims the car as his, so since the investigation now involves more than just the person behind the wheel... It’s likely Joel or Jerome Vangheluwe the owners of the car possibly brainwashed James Alex Fields to do the attack. See folks eventually you can connect the dots, and this was likely an ordered hit by the Vangheluwe family in Michigan who could of possibly brainwashed James Alex Fields into this attack as the DOJ is reporting that the driver may not be the only person involved in this horrible incident.

49. Studio News Network, a political blog operated by Defendant Jonathan Spiel, posted a video on the blog’s YouTube page with the headline: “Left-winger mowed down antifa protestors in Charlottesville, not a right-winter Evidence indicates”.⁵ The thumbnail of the video is a picture of Joel Vangheluwe.

50. Additionally, Studio News Network posted a “news” article on the Studio News Network website, studionewsnetwork.com. The article stated: “License plate searches of the 2010 Dodge Challenger that killed one and injured nearly 20 in

⁵ Exhibit E (Studio News Network Video)

Charlottesville found that the vehicle was registered to a Jerome Vangheluwe of Michigan. A Facebook crawl of his relatives reveals the car was in the possession of his son, Joel.”⁶ The article also incorporated screenshots of Joel Vangheluwe’s LinkedIn and Facebook pages, which included such personal information as his picture, his current location, and where and when he attended high school.

51. Defendant Shirley Husar posted the article from “Puppet String News” to her Facebook page, along with the original text:

The world is going mad. Evidence indicates a left-winger mowed down antifa counter-protestors in #Charlottesville, not a right-winger or white nationalist, GotNews can exclusively reveal. License [sic] plate searches of the 2010 Dodge Challenger that killed one and injured nearly 20 in Charlottesville found that the vehicle was registered to a Jerome Vangheluwe of Michigan. A Facebook crawl of his relatives reveals the car was in the possession of his son, Joel [...]”⁷

52. Pictures with the Vangheluws’ personal information were incorporated into Defendant Husar’s Facebook post, including Joel Vangheluwe’s social media accounts, location information and addresses, registration information, and information about where Joel attended high school.

53. Defendant Eduardo Doitteau posted from his handle on Twitter: “REPORT: Antifa member Joel Vangheluwe from Romeo, Michigan, was the driver that mowed down his other Antifas protesting. #Charlottesville.”⁸ Attached to the

⁶ Exhibit F (Studio News Network Article)

⁷ Exhibit G (Shirley Husar’s Facebook post)

⁸ Exhibit H (Eduardo Doitteau Twitter post)

post was a collage of pictures from Joel Vangheluwe's social media accounts along with registration information for the Dodge Challenger indicating the vehicle belonged to Joel's father, Jerome. The collage also included Joel's email address, current location, and a picture of Joel from his LinkedIn page.

54. Defendant Lita Coulthart-Villanueva posted from her handle on Twitter: "Killer confirmed. Jerome Vangheluwe [...]"⁹ Attached to the post was a link to a huffingtonpost.com article about the attack in Charlottesville and an image of the Dodge Challenger driving into protesters.

55. Defendant Kenneth Strawn posted from his handle on Twitter: "Yes, it's #OhioGVF1111 and the driver's name is Joel VanGheluwe [sic]. His Facebook is loaded with anti-Trump, pro-globalist rhetoric."¹⁰

56. Defendant Patrick Lehnhoff posted on his Facebook page:

I doubt they call this an act of terrorism based on the fact that the perpetrator is a white male presumably Christian...

[...]

This is the car that ran over our comrades. Killed 3. 19 v seriously injured. This vehicle is registered / owned by [sic]: Jerome Vangheluwe [...]¹¹

⁹ Exhibit I (Lita Coulthart-Villanueva Twitter post)

¹⁰ Exhibit J (Kenneth Strawn Twitter post)

¹¹ Exhibit K (Patrick Lehnhoff's Facebook post)

Defendant Lehnhoff then listed Jerome Vangheluwe's residential address along with the year, make, model and VIN number of the Dodge Challenger.

57. Defendant Beth Eyestone posted on her Facebook page a picture of the Dodge Challenger along with the text: "This is the car that ran over our comrades. Killed 3. 19 v seriously injured. This vehicle is registered/owned by: Jerome Vangheluwe [...]"¹² Defendant Eyestone then listed Jerome Vangheluwe's residential address along with the year, make, model and VIN number of the Dodge Challenger.

58. Defendant Lori Twohy posted on her Facebook page: "This is the car that ran over our comrades. Killed 3. 19 v seriously injured. This vehicle is registered/owned by: Jerome Vangheluwe [...]"¹³ Defendant Twohy then listed Jerome Vangheluwe's residential address along with the year, make, model and VIN number of the Dodge Challenger. On the same post, Defendant Twohy also wrote: "It's time to ACTUALLY stroke back, comrades."

59. Defendant Raechel Hitchye posted on her Facebook page: "This is the car that ran over our comrades. Killed 3. 19 v seriously injured. This vehicle is registered/owned by: Jerome Vangheluwe [...]"¹⁴ Defendant Hitchye then listed Jerome Vangheluwe's residential address along with the year, make, model and VIN

¹² Exhibit L (Beth Eyestone Facebook post)

¹³ Exhibit M (Lori Twohy Facebook post)

¹⁴ Exhibit N (Raechel Hitchye Facebook post)

number of the Dodge Challenger. On the same post, Defendant Hitchye also wrote: “It’s time to ACTUALLY stroke back, comrades.”

60. Defendant James Christopher Hastey posted from his Twitter account: “#Charlottesville driver turns out to be anti-Trump Antifa Joel Vangheluwe – when are we going to declare #antifa a terrorist organization?”¹⁵

61. Defendant Christopher Jones posted from his Facebook page: “Jerome Vangheluwe is a Neo-Nazi who just drove his car into a crowd of protesters. They [sic] are saying they now have him in custody , [sic] but hey here’s his info anyway...in case we need to “convey” our dislike for him and his kind in the future.”¹⁶ Defendant Jones then listed Jerome Vangheluwe’s residential address along with the year, make, model and VIN number of the Dodge Challenger.

62. Defendant Connie Comeaux posted from her Twitter handle: “This is the Nazi Coward who deliberately drove his car into people: Jerome Vangheluwe [...]”¹⁷ Defendant Comeaux then listed Jerome Vangheluwe’s residential address.

63. Defendant Gavin McInnes posted from his Twitter handle: “Uh oh. Looks like car terrorist today may have been a lefty who thought he was mowing

¹⁵ Exhibit O (James Christopher Hastey Twitter post)

¹⁶ Exhibit P (Christopher Jones Facebook post)

¹⁷ Exhibit Q (Connie Comeaux Twitter post)

down racists.”¹⁸ He then incorporated a screenshot of Joel’s Facebook page which included his full name.

64. Defendant Richard Weikart posted from his Twitter handle: “Joel Vangheluwe from Romeo, Michigan Car OHIO LICENSE PLATE # GVF 1111 2010 GRAY DODGE CHALLENGER #Charlottesville was the attacker [...]”¹⁹

65. Defendant Paul Nehlen posted from his Twitter handle: “BREAKING: #Charlottesville Car Terrorist Is Anti-Trump, Open Borders Druggie.”²⁰ He then incorporated the GotNews article into his post, which names Joel Vangheluwe as the attacker.

66. The Dodge Challenger that struck the crowd of counter-protesters at the rally was not titled to any member of the Vangheluwe family at the time of the incident. The car passed through several owners between the time Mr. Vangheluwe sold the vehicle, which was several years ago, and the day of the rally.

67. After the defamatory information was posted on the internet by GotNews and the other Defendants, the Vangheluwes began receiving countless anonymous threats. Michigan State police were notified and the family was warned to leave their home. The threats caused the Vangheluwes to fear for their safety and

¹⁸ Exhibit R (Gavin McInnes Twitter post)

¹⁹ Exhibit S (Richard Weikart Twitter post)

²⁰ Exhibit T (Paul Nehlen Twitter post)

well-being. Clients of Jerome Vangheluwe's business also became fearful after the online threats.

68. On November 6, 2017, counsel for Plaintiffs sent retraction letters to each of the above-named Defendants. The retraction letter demanded a full and unqualified retraction pursuant to Mich. Comp. Laws Ann. § 600.2911(b), and allowed Defendants a reasonable amount of time to do so.

69. Jerome and Joel Vangheluwe experienced serious and severe emotional and physical distress as a result of the Defendants' defamatory statements and suffered harm to their reputations, lost earnings, and other pecuniary loss.

FIRST CAUSE OF ACTION
Defamation / Defamation Per Se
(Against all Defendants)

70. Plaintiffs repeat and re-allege all of the allegations stated herein, and reincorporate them by reference as though fully set forth herein.

71. Plaintiffs are not public officials or public figures.

72. Plaintiffs are private individuals.

73. The Defendants intentionally caused the publication of false and unprivileged oral and written statements that had a tendency to damage the Plaintiffs' reputation and character.

74. Defendants' website posts, tweets and other social media were read by tens of thousands of individuals on the Internet, and constitute publication under the

law.

75. Defendants' statements are false and have a natural tendency to injure the reputations and financial interests of Plaintiffs. Specifically, Defendants' accusations that the Vangheluwes were involved in the commission of a terror attack on American soil were false and defamatory.

76. To state that someone is a terrorist subjects them to scorn and outrage by the community.

77. Defendants knew or had reason to know that these statements were false when they made them, but they made them anyway.

78. The false statements accusing Plaintiffs of a crime are per se defamatory.

79. Defendants made the false statements with malice to further their own political agendas.

80. As a direct and proximate result of Defendants' conduct alleged herein, the Vangheluwes have suffered general and special damages including, without limitation, harm to their reputations, emotional distress, lost earnings, and other pecuniary loss, all of which are in excess of \$75,000.

SECOND CAUSE OF ACTION

Intentional Infliction of Emotional Distress (Against all Defendants)

81. Plaintiffs incorporate into Count Two the allegations in the foregoing

paragraphs.

82. Defendants' conduct was designed to inflict maximum emotional distress on Plaintiffs Jeremy and Joel Vangheluwe.

83. Defendants knew that serious and severe emotional distress to the Vangheluwes was certain or substantially certain to result from their conduct.

84. Defendants could reasonably foresee the consequences of their conduct and actually intended such consequences to occur.

85. Defendants' conduct was extreme and outrageous and went beyond all possible bounds of decency.

86. Defendants' conduct was not for any proper purpose, nor was it within the scope of Defendants' authority.

87. The Vangheluwes have experienced serious and severe emotional distress as a direct and proximate result of the Defendants' conduct.

88. As a direct and proximate result of Defendants' conduct, Plaintiffs have suffered humiliation, mortification, embarrassment, sleeplessness and anxiety, and other damages that may arise during the course of discovery.

89. Defendants are liable to the Vangheluwes for the emotional distress they caused in an amount greater than \$75,000 to be determined at trial.

THIRD CAUSE OF ACTION
Invasion of Privacy: False Light
(Against all Defendants)

90. Plaintiffs incorporate into Count Three all allegations in the foregoing paragraphs.

91. Defendant caused there to be publicity concerning the Plaintiffs.

92. The publicity placed the Plaintiffs in a false light in the public eye. Specifically, Defendants made statements that put the Plaintiffs in a false light.

93. Plaintiffs had a right to keep intimate details and matters private.

94. Defendants communicated information about Plaintiffs publicly.

95. Defendants' statements were false and highly offensive, and would be highly offensive to a reasonable person.

96. Defendants' conduct as outlined above was reckless and of such character as to be intolerable in civilized society.

97. Defendants' conduct was not for any proper purpose, nor was it within the scope of Defendants' authority, or otherwise immune or privileged.

98. As a direct and proximate result of Defendants' conduct, Plaintiffs have suffered humiliation, mortification, embarrassment, sleeplessness and anxiety, and other damages that may arise during the course of discovery.

99. Defendants' conduct deliberately and intentionally injured the Plaintiffs; the acts were willful and malicious.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs Joel and Jerome Vangheluwe pray for judgment against Defendants, severally and individually, awarding:

- A. Compensatory damages, including but not limited to, lost wages and benefits, loss of peace of mind and enjoyment of life, damages to health and reputation, emotional distress, and other specific and general damages in an amount proven at trial;
- B. Exemplary and punitive damages in an amount to be proven at trial;
- C. Attorney's fees and costs;
- D. Prejudgment and post judgment interest;
- E. Civil penalties and fines as determined by statute;
- F. Any other relief to which Plaintiffs may be entitled upon proof at trial that the Court deems just and proper.

Respectfully submitted,

SOMMERMAN, McCAFFITY
& QUESADA, L.L.P.

/s/ Andrew B. Sommerman

Andrew B. Sommerman*
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/s/ *Raeche M. Badalamenti*

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Dated: February 12, 2018

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
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Christopher Jones, Connie Comeaux,
Gavin McInnes, and Richard
Weikart, and Paul Nehlen,

Defendants.

Case No. :

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues triable by a jury.

Respectfully submitted,

SOMMERMAN, McCAFFITY
& QUESADA, L.L.P.

/s/ Andrew B. Sommerman

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*Application for Admission to the Eastern
District of Michigan Pending

AND
KIRK, HUTH, LANGE
& BADALAMENTI, PLC

/s/ *Raeche M. Badalamenti*

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Dated: February 12, 2018